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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ROSEN MARIANO, an individual,  
  
Plaintiff,

vs.

THE CITY OF LAS VEGAS, a political  
subdivision of the State of Nevada;  
CORRECTIONAL HEALTHCARE  
COMPANIES, INC., a foreign corporation;  
CORRECT CARE SOLUTIONS, LLC, a foreign  
limited liability company; MICHELE  
FREEMAN, Chief of Detention Enforcement for  
the City of Las Vegas; CORRECTION OFFICER  
DOE 1-10; HEALTHCARE WORKER DOES  
11-20; DOES 21-99; inclusive; ROE  
CORPORATIONS 100-199, inclusive,  
  
Defendants.

CASE NO.: 2:18-CV-01911-APG-EJY

**STIPULATION AND ORDER TO**  
**EXTEND DEADLINE TO FILE JOINT**  
**PRETRIAL ORDER**

**(First Request)**

IT IS HEREBY STIPULATED AND AGREED, between the Parties, by and through their  
respective counsel of record, that the deadline for the proposed joint pretrial order will be extended to  
December 13, 2023. This is the Parties' first request to extend time. This Stipulation and [Proposed]  
Order is submitted in accordance LR IA 6-1.



The Parties respectfully request this brief extension of time to accommodate both parties in light of the Thanksgiving holiday. In addition, the Parties respectfully request this brief extension of time to accommodate Plaintiff's counsel. Specifically, Mr. Prince has family (daughter, son-in-law, and one-year-old grandson) coming into town November 18-25, 2023. Mr. Prince is hosting his grandson's one year birthday party at his house on November 22, 2023. The requested extension of time will allow the Parties to comprehensively address the matters in the Joint Pretrial Order. The Parties' requested extension is not made in bad faith or to unnecessarily delay these proceedings. Therefore, the Parties respectfully request the Court approve the foregoing stipulation.

DATED this 16<sup>th</sup> day of November, 2023

**PRINCE LAW GROUP**

/s/ Dennis M. Prince  
DENNIS M. PRINCE  
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Attorneys for Plaintiff  
*Rosen Mariano*

DATED this 16<sup>th</sup> day of November, 2023

**LEWIS BRISBOIS BISGAARD & SMITH**

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Attorneys for Defendant  
*Correct Care Solutions, LLC*

DATED this 16<sup>th</sup> day of November, 2023

**LAS VEGAS CITY ATTORNEY'S OFFICE**

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Attorneys for Defendants  
*City of Las Vegas and Michelle Freeman*

IT IS SO ORDERED.

  
U.S. MAGISTRATE JUDGE

Dated: November 17, 2023

